

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIV.

2023 FEB -9 A 10:51

CLERK CRSbell

MS. JOHNNIE MARENE THOMAS, PRO-SE
PLAINTIFF,

VS.

CASE NO. CV 223-023

WILLIAM R. ASHE
IN A INDIVIDUAL CAPACITY
DEFENDANT

PLAINTIFF CIVIL COMPLAINT
AUTHORITY: FED. R. CIV. P 38 (A) & (B)
DEMAND FOR JURY TRIAL

**PLAINTIFF MS. JOHNNIE MARENE THOMAS, representing herself in
pursuant to 28 U.S.C. 1654 sues Defendant WILLIAM R. ASHE of the following:**

1. This is a claim for damages that exceed Fifty Thousand dollars (\$50,000.00) and to redress violation of Plaintiff's rights under the United States Constitution and more particularly the DUE PROCESS clause of the fourteenth (14th) Amendment protect the people from arbitrary deprivation of life, liberty and property without DUE PROCESS of LAW. See case law Deshaney v. Winnebago County Department of Social Services, 489 U.S. pages 189 and 196, (1993) Plaintiff Personal Rights were violated, as stated in Twombly this complaint meets the requirement case law Bell Atl. Corp. v. Twombly, 550 U.S. 544, 127 S. Ct. 1955, 167 L.Ed. 2d 929 (2007), the complaint is plausible on its face. **William R. Ashe is an attorney acting outside of his jurisdiction and professional scope by knowingly, willfully and intentionally representing a County Probate Judge and a County Attorney.**

JURISDICTION

THIS COURT has jurisdiction over this action pursuant to 28 U.S.C. Sec. 1331 of the United States Constitution tort.

At all time material to this action, WILLIAM R. ASHE is a licensed attorney, Georgia Bar No. 000490.

PLAINTIFF CAUSE OF ACTION

FIRST AND FOREMOST, I FIND IT VERY DIFFICULT TO BELIEVE THAT ATTORNEY WILLIAM R. ASHE IS AWARE OF WHY JUDGE ROBERT SWEATT AND ATTORNEY JOHN MYERS CONTACTED HIM AND HE STILL TOOK IT UPON HIMSELF TO SIGN HIS NAME ON DOCUMENTS SUBMITTED TO THE FEDERAL COURT REGARDING THIS CIVIL MATTER AS "ATTORNEY FOR DEFENDANT". WITH THAT BEING SAID, I AM LEAD TO BELIEVE THAT ATTORNEY WILLIAM R. ASHE IS AS CORRUPT AS JUDGE SWEATT AND ATTORNEY MYERS.

ATTORNEY WILLIAM R. ASHE AND BOTH OF HIS CLIENTS (SWEATT and MYERS) TOOK AN OATH TO UPHOLD THE LAW AND NOW ATTORNEY ASHE HAS KNOWINGLY, WILLFULLY AND INTENTIONALLY CIRCUMVENT THE STATE OF GEORGIA CONSTITUTION AND THE UNITED STATES CONSTITUTION AND ALL THE COURT SYSTEMS, BY ATTEMPTING TO REPRESENT TWO PEOPLE WHO ARE RESPONSIBLE FOR UNLAWFUL CIVIL ACTS TAKEN AGAINST ME (MS JOHNNIE MARENE THOMAS) STARTING BACK IN 2018:

FIRST: JUDGE ROBERT C. SWEATT, JR., (a state actor), who appointed John Myers..

JUDGES CAN ONLY BE REPRESENTED BY THE ATTORNEY GENERAL. I WILL NEED THE ATTORNEY GENERAL'S OFFICE TO PROVIDE ME WITH DOCUMENTATION SUPPORTING WILLIAM R. ASHE HAVE RECEIVED A CONTRACTUAL AGREEMENT FROM THE ATTORNEY GENERAL TO REPRESENT JUDGE SWEATT/COUNTY EMPLOYEES.

SECOND: ATTORNEY JOHN S MYERS., (a state actor), who accepted the Appointment from Probate Judge Robert C Sweatt, Jr. COUNTY EMPLOYEES CAN ONLY BE REPRESENTED BY THE ATTORNEY GENERAL. I WILL NEED THE ATTORNEY GENERAL'S

OFFICE TO PROVIDE ME WITH DOCUMENTATION SUPPORTING WILLIAM R. ASHE HAVE RECEIVED A CONTRACTUAL AGREEMENT FROM THE ATTORNEY GENERAL TO REPRESENT JUDGE SWEATT/COUNTY EMPLOYEES.

JUST A QUICK REMINDER OF MY CASE WHICH HAS BEEN FILED IN FEDERAL COURTS AGAINST ROBERT C. SWEATT, JR. and JOHN S. MYERS UNLAWFUL ACTS:

JOHN MYERS was appointed the "Administrator" of IRENE D THOMAS ESTATE "UNLAWFULLY" on December 5, 2018 BY PROBATE JUDGE ROBERT C. SWEATT, JR. (PLEASE CHECK: CV 222-139)

THIS COURT must note that **LAWFUL HEIR (ME), MS JOHNNIE MARENE THOMAS, NEVER** elected Attorney John S. Myers, to become the administrator of my deceased belated IRENE C. DERRY THOMAS' estate on December 5, 2018 **nor** any other time before or after that date. **THAT ACT was unconstitutional in pursuant to THE OFFICIAL GEORGIA PROBATE CODE. (PLEASE CHECK: CV222-147)**

By this action attorney John S. Myers did not have any authority to become eligible to be the administrator by law. There is no qualified immunity available *to a defendant sued in his individual capacities*. County Employees may be found **liable**. The action taken clearly violated established Federal Constitutional Law (see case law: **Harlow v. Fitzgerald, 457 U.S.C. 800-818 N 32 (1982).**

I'M SURE THIS COURT IS FULLY AWARE OF THE AUGUST 31, 2022 UNLAWFUL ACTIONS ROBERT C. SWEATT, JR. TOOK UPON HIMSELF. (PLEASE CHECK CV222: 139)

Therefore, THIS COURT must note that the actions of WILLIAM R. ASHE is UNLAWFUL AND UNCONSTITUTIONAL when HE knowingly, willfully and intentionally INVOLVED HIMSELF in two cases outside of his jurisdiction and professional scope UNLESS DOCUMENTATION FROM THE ATTORNEY GENERAL'S OFFICE STATING ASHE HAS A LEGAL CONTRACTUAL AGREEMENT FROM THE ATTORNEY GENERAL TO REPRESENT JUDGE SWEATT/COUNTY EMPLOYEES ARE PRESENTED TO ME AND THIS COURT.

IF ATTORNEY ASHE DOES NOT HAVE LEGAL DOCUMENTATION/CONTRACTUAL AGREEMENT FROM THE ATTORNEY GENERAL'S OFFICE allowing him to represent COUNTY EMPLOYEES, then it is fair to remind THIS COURT that ASHE as well as the other parties (Sweatt and Myers) took an oath to uphold the law and instead, they are breaking the OATHS and they are worse than the communist by

operating under "THEIR OWN LAW" and NOT the law of the Georgia Constitution nor the law of the United States Constitution. Once again, Judge Sweatt and Attorney Myers are demonstrating UNLAWFUL/UNCONSTITUTIONAL BEHAVIOR and now Attorney William Ashe.

UNLESS DOCUMENTATIONS ARE PRESENTED BY THE STATE OF GEORGIA ATTORNEY GENERAL'S OFFICE, I AM DEMANDING THAT THIS COURT IMPOSE THE FOLLOWING SANCTIONS AGAINST ATTORNEY WILLIAM R. ASHE IMMEDIATELY AS FOLLOWS:

RELIEF

WHEREFORE, PLAINTIFF MS. JOHNNIE MARENE THOMAS, due hereby request the following from Attorney William R. Ashe., in his individual and personal capacity

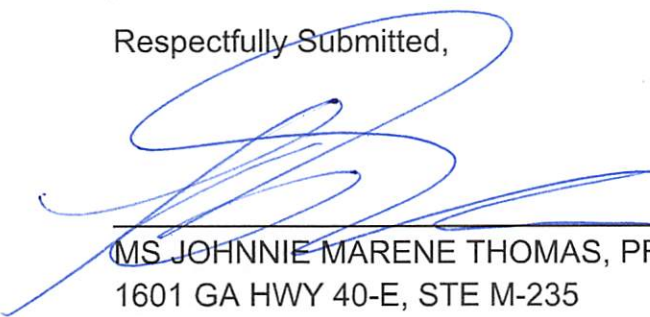
- TWENTY-MILLION DOLLARS (\$20,000,000.00): FOR all of the emotional pain, mental anguish, inconvenience, and other damages subjected upon me
- TWENTY-MILLION DOLLARS (\$20,000,000.00): FOR FALSELY REPRESENTING PROBATE COUNTY JUDGE (ROBERT SWEATT, JR) (CV222-139);
- TWENTY-MILLION DOLLARS (\$20,000,000.00): FOR FALSELY REPRESENTING COUNTY ATTORNEY (JOHN MYERS), (CV222-147)
- TWENTY-MILLION DOLLARS (\$20,000,000.00): FOR PUNITIVE DAMAGE
 - TOTAL SANCTION AMOUNT:
 - EIGHTY-MILLION DOLLARS (\$80,000,000.00) BEFORE INTEREST
 - THE INTEREST RATE OF 12% ANNUM FROM DATE OF DEFAULT/JUDGMENT UNTIL PAYMENT IN FULL (OCGA 7-4-12)

I am requesting a jury trial of my peers and a permanent injunction to bar attorney WILLIAM R. ASHE.

CITATION OF AUTHORITIES

FEDERAL RULES OF CIVIL PROCEDURES, RULE 11: Signing Pleadings, Motions and Other Papers; Representations to the Court; Sanctions

Respectfully Submitted,



MS JOHNNIE MARENE THOMAS, PRO-SE
1601 GA HWY 40-E, STE M-235
Kingsland, GA 31548
404-981-1987

2/9/2023
Date

Attached:

EXHIBIT A:

- LETTER FROM ATTORNEY WILLIAM ASHE (Attorney for Defendant)
CAMDEN COUNTY PROBATE JUDGE ROBERT C. SWEATT, JR.

EXHIBIT B:

- LETTER FROM ATTORNEY WILLIAM ASHE (Attorney for Defendant)
CAMDEN COUNTY ATTORNEY JOHN S. MYERS

EXHIBIT C:

- MEMORANDUM OF LAW - 14TH AMENDMENT CASES- DUE PROCESS

EXHIBIT D:

- TO BE EXPEDITED IMMEDIATELY - DEFAULT JUDGMENTS

EXHIBIT E:

- THE LAW OFFICES OF WILLIAM R. ASHE - ATTORNEY BIOGRAPHY

Verification of Signature